



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION VII

726 MINNESOTA AVENUE  
KANSAS CITY, KANSAS 66101

SEP 4 1990

Andrew Bowey  
Technical Representative  
Total Containment  
306 Commerce Drive  
Exton, Pennsylvania 19341

Dear Mr. Bowey:

The Office of Underground Storage Tanks has reviewed Total Containment's "Enviroflex" piping and has determined, for the interim, that it meets the requirements for piping in 40 CFR. 280.20(b)(4) if certain conditions are met. Enclosed is a copy of that determination.

As stated, this determination is not final. It will be reconsidered by EPA if Total Containment fails to obtain a listing from the Underwriters Laboratories (UL) Inc. in a timely manner (one year), does not pass independent laboratory tests, or experiences operational problems with the integrity of the piping system at the facilities where it is currently installed. If any of these occur, owners who have installed this piping will be required to remove it. Please keep me informed on each of the above items.

Until a final determination by EPA is made, use of this piping will require that Total Containment fulfill the following special conditions for each facility where "Enviroflex" piping is used:

1. Piping will be continuously and automatically monitored,
2. All sumps will be inspected monthly,
3. Installation procedures will adhere to the requirements in ANSI/NFPA 30A, PEI/PRIOO, and API 1615, and
4. Records documenting compliance with these conditions will be kept on site.

Please send me a written response that Total Containment will adhere to these conditions. Of course, owners must meet all the regulatory requirements for underground storage tank systems.

During our telephone conversations you mentioned that some facilities in EPA, Region VII (Nebraska, Iowa, Kansas, and Missouri) are using "Enviroflex" piping. For each location, please provide the company's name, address, name of the person to Contact and their telephone number and the facility's name, address, person to contact and their telephone number.

Finally, please remember that owners must also comply with the requirements of the state and local agencies. They may be different or more stringent than EPA's.

If you would like to discuss this or have questions, please call me at (913.) 551-7651.

Sincerely,

Lee Daniels  
UST/LUST Program Coordinator

Enclosure

cc: Dave O'Brien, OUST  
Clark Conklin, NSF  
Keith Bridson, IDNR  
Gary Blackburn, KDHE  
Gordon Ackley, MDNR  
RPM's Region 1 - 10